

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ANDREW BRUNS IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S RENEWED MOTION TO COMPEL**

I, Andrew Bruns, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and am admitted to practice before this Court. I am an attorney at the law firm of Keker, Van Nest & Peters LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Memorandum of Law in support of its Renewed Motion to Compel. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as **Exhibit 1** is a true and correct copy of a document Singular produced in this litigation beginning at SINGULAR-00006379.

4. Attached as **Exhibit 2** is true and correct copy of a January 29, 2021 email from Anna Porto to Counsel for Singular.

5. Attached as **Exhibit 3** is a true and correct copy of a February 2, 2021 email from Jay Rapaport to Kevin Gannon.

6. Attached as **Exhibit 4** is a true and correct copy of a document Singular produced in this litigation beginning at SINGULAR-00012094.

7. Attached as **Exhibit 5** is a true and correct copy of a March 12, 2021 email from Anna Porto to Counsel for Singular.

8. Attached as **Exhibit 6** is a true and correct copy of a March 16, 2021 email chain between Anna Porto and Brian Seeve.

9. Attached as **Exhibit 7** is a true and correct copy of a March 19, 2021 email from Anna Porto to Brian Seeve.

10. Attached as **Exhibit 8** is a true and correct copy of a March 23, 2021 email from Anna Porto to Brian Seeve.

11. Attached as **Exhibit 9** is a true and correct copy of an April 2, 2021 email from Anna Porto to Brian Seeve.

12. Attached as **Exhibit 10** is a true and correct copy of a document Singular produced in this litigation beginning at SINGULAR-00012101.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on April 26, 2021 at Mill Valley, California.

/s/ Andrew Bruns

Andrew Bruns

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan Speed

Nathan Speed